



MATTHEW L. SCHWARTZ
Tel.: (212) 303-3646
E-mail: mlschwartz@bsflp.com

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BY ECF

The Honorable Alison J. Nathan
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

**Re: *City of Almaty, Kazakhstan, et ano. v. Felix Sater, et al.*,
Case No. 19 Civ. 2645 [rel. 15 Civ. 5345] (AJN) (KHP)**

Dear Judge Nathan:

We represent the City of Almaty, Kazakhstan and BTA Bank (the “Kazakh Entities”) and write in reference to our December 4, 2020 letter concerning the status of the in-default defendant MeM Energy Partners LLC (“MeM Energy”). [ECF No. 247.]

The Kazakh Entities and MeM Energy’s principal, Mr. Mochkin, have been participating in discussions that are ongoing. Additionally, the non-defaulting defendants held a settlement conference on February 24, 2021, and Judge Parker granted a 90-day discovery extension in part to allow those discussions to continue. [ECF No. 284.] The Kazakh Entities anticipate resolving our settlement discussions with MeM Energy within thirty days, and we expect to either settle our claims against MeM Energy or move for default on March 28, 2021. Of course, should the Court prefer that we move for default sooner, we are prepared to do so.

Thank you for your consideration.

Respectfully,

/s/ Matthew L. Schwartz
Matthew L. Schwartz

cc: All Counsel of Record (by ECF)
Michael Soshnick, Esq., counsel for Mendel Mochkin (by email)